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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHINA ENERGY CORPORATION, a Nevada
corporation,

Plaintiff,

vs.

ALAN T. HILL, ELENA SAMMONS,
MICHAEL SAMMONS, THOMAS S.
VREDEVOOGD, TRUSTEE OF THE
KIMBERLY J. VREDEVOOGD TRUST UA
1007/2008, JUN HE, and RANDY DOCK
FLOYD,

Defendants.

CASE NO. 3:13-cv-00562-MMD-VPC

**STIPULATION AND [PROPOSED] ORDER ESTABLISHING A BRIEFING
SCHEDULE ON ALL MOTIONS FOR SUMMARY JUDGMENT REGARDING CEC'S
FIRST CLAIM FOR RELIEF**

(FIRST REQUEST)

1 Plaintiff, China Energy Corporation (“CEC”), by and through its counsel of record,
2 Gordon Silver and Ulmer & Berne LLP, and Defendants, in proper person and through their
3 respective counsel as indicated below, hereby stipulate and agree as follows:

4 1. The deadline to file motions for summary judgment is December 19, 2014. (Dkt.
5 No. 274).

6 2. As of the date of this stipulation, one motion for summary judgment has been
7 filed on behalf of Defendant Alan T. Hill. (Dkt. No. 280). CEC’s opposition to this motion is
8 currently due on or before December 4, 2014. *See* LR 7-2(e).

9 3. However, given that this case involves six individual defendants and one third
10 party defendant, the parties anticipate that multiple motions for summary judgment will be filed
11 by the parties.

12 3. In order to promote efficiency in managing the deadlines associated with multiple
13 motions and the Court’s decisions with respect to such motions, and to avoid confusion as to the
14 briefing deadlines, the parties agree that any opposition to any motion for summary judgment
15 should be due on the same date. Similarly, any reply in support of any motion for summary
16 judgment should be due on the same date.

17 4. As such, the parties stipulate and agree to the following briefing schedule:

18 a. Any opposition to any motion for summary judgment filed by any party
19 with respect to CEC’s first claim for relief is due on or before January 20, 2015.

20 b. Any reply in support of any motion for summary judgment with respect to
21 CEC’s first claim for relief is due on or before February 6, 2015.

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5. This is the first stipulation regarding a modification to the briefing schedule for motions for summary judgment on CEC's first claim for relief.

DATED this 4th day of December, 2014.

DATED this 4th day of December, 2014.

GORDON SILVER

HOLLAND & HART

By: /s/ Justin J. Bustos

By: /s/ Richard L. Elmore

Michael N. Feder
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Richard L. Elmore
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Attorney for Thomas S. Vredevoogd, Trustee
the Kimberly J. Vredevoogd Trust UA
1007/2008

Attorneys for China Energy Corporation

DATED this 4th day of December, 2014.

DATED this 4th day of December, 2014.

By: /s/ Elena Sammons

By: /s/ Michael Sammons

Elena Sammons
15706 Seekers St
San Antonio, TX 78255

Michael Sammons
15706 Seekers St
San Antonio, TX 78255

Defendant in Proper Person

Defendant in Proper Person

DATED this 4th day of December, 2014

DATED this 4th day of December, 2014.

RUMBERGER KIRK & CALDWELL

By: /s/ Edmund J. Gorman

By: /s/ Meredith Lees

Edmund J. Gorman Jr.
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Rebecca Beers, admitted pro hac vice
2204 Lakeshore Drive, Suite 125
Birmingham, AL 35209

Attorney for Defendant Alan T. Hill

Attorneys for COR Clearing, LLC

1 DATED this 4th day of December, 2014

DATED this 4th day of December, 2014

2 By: /s/ Jun He
3 Jun He
4 231 Split Rock Rd
The Woodlands, TX 77381

By: /s/ Randy Dock Floyd
Randy Dock Floyd
4000 Goff Road
Aynor, SC 29551

5 Defendant in Proper Person

Defendant in Proper Person

ORDER

Pursuant to the foregoing Stipulation, IT IS HEREBY ORDERED that any opposition to any motion for summary judgment filed by any party with respect to CEC's first claim for relief is due on or before January 20, 2015.

IT IS FURTHER ORDERED that any reply in support of any motion for summary judgment filed by any party with respect to CEC's first claim for relief is due on or before February 6, 2015.

IT IS SO ORDERED

DATED this _____ day of December, 2014.

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

The undersigned, an employee of Gordon Silver, hereby certifies that she served a copy of
STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR TO DEPOSE THE
DEPOSITORY TRUST COMPANY via CM/ECF on December 4, 2014 to the following
individuals:

Richard L. Elmore, Esq.
Holland & Hart
5441 Kietzke Lane, 2nd Floor
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Attorney for Thomas S. Vredevoogd,
Trustee of the Kimberly J. Vredevoogd
Trust UA 1007/2008

Michael Sammons
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RUMBERGER KIRK & CALDWELL
2204 Lakeshore Drive, Suite 125
Birmingham, AL 35209

And by U.S. Mail, postage prepaid, to the following individuals:

Elena Sammons
15706 Seekers St
San Antonio, TX 78255
Defendant in Proper Person

Randy Dock Floyd
4000 Goff Road
Aynor, SC 29551
Defendant in Proper Person

Jun He
231 Split Rock Rd
The Woodlands, TX 77381
Defendant in Proper Person

/s/ Cindy S. Grinstead
An employee of GORDON SILVER